

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

UNITED STATES DISTRICT COURT

for the

Northern

District of

Oklahoma

FILED

NOV 13 2018

Mark C. McCart, Clerk
U.S. DISTRICT COURT

Division

Case No. 18 CV 581 GKF - FHM

(to be filled in by the Clerk's Office)

1 Willette Glover ²/Willie T Houston

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) Yes ☒ No1 Robert Mercogliano, ²Micheal Kleinman, ³Fred James, ⁴Carla Jordan, ⁵Fat Possum, ⁶George Lawhorn (Youtube), ⁷Apple iTunes and ⁸Alive Natural Sounds

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Willette Glover/Willie T Houston
Street Address	P.O. Box 2613
City and County	Sapulpa Creek
State and Zip Code	Oklahoma 74067
Telephone Number	(405) 514-3688
E-mail Address	Curshaw16@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant

Sumner
IFP

is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	Robert and Connie Mercogliano
Job or Title (<i>if known</i>)	Video/Film Company
Street Address	6480 Olive Street
City and County	Commerce City
State and Zip Code	Colorado 80022
Telephone Number	(303) 287-7473
E-mail Address (<i>if known</i>)	supemerc81@comcast.net

Defendant No. 2

Name	Micheal J Kleinman Esq
Job or Title (<i>if known</i>)	Lawyer
Street Address	9490 S Aspen Hill Way
City and County	Lone Tree
State and Zip Code	Colorado 80124
Telephone Number	(720) 920-9903
E-mail Address (<i>if known</i>)	michealjkleinmanlaw@gmail.com

Defendant No. 3

Name	Fred Jones/Taxim Records, Black Magic Records, Ace Records (U.K), and Germany Family Bear Records
Job or Title (<i>if known</i>)	Producer
Street Address	P.O. Box 68096
City and County	Nashville
State and Zip Code	Tennessee 37206
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	Carla Jordan
Job or Title (<i>if known</i>)	Club Promoter and Owner
Street Address	4923 W 38th Avenue
City and County	Denver
State and Zip Code	Colorado 80221
Telephone Number	
E-mail Address (<i>if known</i>)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties

is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

George Lawhorn - Youtube
Youtube CEO
901 Cherry Avenue
San Bruno
California

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

BMI Records - Michael O'Neill
Producer
10 Music Square E
Nashville, TN
Tennessee 37203
(615) 401-2000
Nashville@bmi.com

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Fat Possum Matthew Johnson
Founder / Producer
P.O. Box 1923
Oxford
Mississippi 38655
(662) 234-2828
Matthew@fatpossum.com

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Apple iTunes - Tim Cook
Apple Computer, Inc 1 Infinite Loop
Cupertino
California 95014
1-800-275-2273
www.apple.com

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of

is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question

x Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Willette Glover/Willie T Houston, is a citizen of the State of *(name)* Oklahoma.

b. If the plaintiff is a corporation

The plaintiff, *(name)* N/A, is incorporated under the laws of the State of *(name)*, and has its principal place of business in the State of *(name)*.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* Robert and Connie Mercogliano, is a citizen of the State of *(name)* Colorado. Or is a citizen of *(foreign nation)*.

b. If the defendant is a corporation

The defendant, *(name)* Merco Photography and Filming Company, is incorporated under the laws of the State of *(name)* Colorado, and has its principal place of business in the State of *(name)* Colorado.

Or is incorporated under the laws of (foreign nation) Germany,
and has its principal place of business in (name) Colorado.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy the amount the plaintiff claims the defendant owes or the amount at stake is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Merco Photography and Filming sold and distributed, Music and a documentary film (Blues, Junk, and Collard Greens) of Willie T Houston without his permission or knowledge.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed. **In the late 2005's, in Denver Colorado, the filming of Blues Junk and Collard Greens, took place at Willie T Houston home. Merco was hired to video a documentary and recording several video's pertaining Willie T Houston. Merco has upload the video's and pictures of Houston without his knowledge to social media sites, such as Flickr, Instagram, Facebook and/or twitter. The film Blues, Junk and Collard Greens was produced in 2005.**

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. *\$150,000.00*

Willette Glover is seeking restitution on behalf of Willie T Houston (her father) for the video sales as well as the documentary sales. The documentary of Blues, Junk and Collard Greens has had several offers to be brought internationally, according to Merco.

another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Shillette Dlover / Willie T Houston, is a citizen of the State of (name) Oklahoma.

b. If the plaintiff is a corporation

The plaintiff, (name) N/A, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Michael J. Kleiman, is a citizen of the State of (name) Colorado. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) N/A, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) Colorado. Or is incorporated under the laws of (foreign nation) _____.

and has its principal place of business in (name) Colorado.

the (If more than one defendant is named in the complaint, attach an additional page providing same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy the amount the plaintiff claims the defendant owes or the amount at stake is more than \$75,000, not counting interest and costs of court, because (explain):

Michael Kleiman represented Houston on Collecting Royalties. Royalties are still being paid + Houston had only received a check for \$5.52

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

In 2012 Kleiman was in charge of pursuing Houston's inquiry pertaining Copyright infringement.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. *\$50,000.00*

Willette Gloner is seeking restitution on behalf of Willie J. Houston royalties.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a

another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Shelley Glover / Willie Houston is a citizen of the State of (name) OKlahoma.

b. If the plaintiff is a corporation

The plaintiff, (name) 7/A, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

the (If more than one plaintiff is named in the complaint, attach an additional page providing same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Fred Jones, is a citizen of the State of (name) Tennessee. Or is a citizen of (foreign nation) Germany, Italy, & U.K.

b. If the defendant is a corporation

The defendant, (name) FRED JONES, is incorporated under the laws of the State of (name) Tennessee, and has its principal place of business in the State of (name) Tennessee. Or is incorporated under the laws of (foreign nation) Germany, Italy.

and has its principal place of business in (name) Tennessee.

the (If more than one defendant is named in the complaint, attach an additional page providing same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy the amount the plaintiff claims the defendant owes or the amount at stake is more than \$75,000, not counting interest and costs of court, because (explain):

Fred Jones Producer was selling Willie T Houston on his social media sites, and was collecting money.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

In 2006, Fred Jones produced Willie T Houston, he (Jones) had the master recordings of Houston.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

*Willie T. Bloner is seeking Willie T. Houston royalties that by law belong to him.
\$150,000.00*

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a

another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Willette Glau/Willie J. Hunter, is a citizen of the State of (name) OKlahoma.

b. If the plaintiff is a corporation

The plaintiff, (name) N/A, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Carla Jordan (Ziggies), is a citizen of the State of (name) Colorado. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____.

and has its principal place of business in (name) Colorado.

the (If more than one defendant is named in the complaint, attach an additional page providing same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy the amount the plaintiff claims the defendant owes or the amount at stake is more than \$75,000, not counting interest and costs of court, because (explain):

Carla Jordan is a club owner, where Houston performed. Carla is selling Houston's music without his permission & knowledge.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

In 2012 Carla Jordan began selling Houston's products (music) on her website. Houston was not aware of his music being sold by Jordan.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Willie Blower is seeking restitution for the selling of Houston music without consent.

\$ 100,000.00

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a

another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Willette Blower/Willie J. Holt, is a citizen of the State of (name) Oklahoma.

b. If the plaintiff is a corporation

The plaintiff, (name) N/A, is incorporated under the laws of the State of (name) N/A, and has its principal place of business in the State of (name) N/A.

the (If more than one plaintiff is named in the complaint, attach an additional page providing same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) George Lawhorn - Youtube, is a citizen of the State of (name) California. Or is a citizen of (foreign nation) N/A.

b. If the defendant is a corporation

The defendant, (name) George Lawhorn Youtube, is incorporated under the laws of the State of (name) California, and has its principal place of business in the State of (name) California. Or is incorporated under the laws of (foreign nation) Germany.

and has its principal place of business in (name) California.

the (If more than one defendant is named in the complaint, attach an additional page providing same information for each additional defendant.)

3. The Amount in Controversy

amount at The amount in controversythe amount the plaintiff claims the defendant owes or the stakeis more than \$75,000, not counting interest and costs of court, because (explain):

George Lawhorn promoted Willie J. Houston Music, without consent.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

George Lawhorn uploaded, promoted + distributed Willie J. Houston, after being asked on several occurrences to take the music down off, Youtube.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Shillette Glover is seeking the monies collected for promoting, Houston's Music without consent.
\$200,000.00

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a

another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) 3 Little Blower/William D. Hout, is a citizen of the State of (name) Oklahoma.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

the (If more than one plaintiff is named in the complaint, attach an additional page providing same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) BMI - Michael O'Neill, is a citizen of the State of (name) Tennessee. Or is a citizen of (foreign nation) London + Puerto Rico.

b. If the defendant is a corporation

The defendant, (name) BMI - Michael O'Neill, is incorporated under the laws of the State of (name) Tennessee, and has its principal place of business in the State of (name) Tennessee. Or is incorporated under the laws of (foreign nation) London + Puerto Rico.

and has its principal place of business in (name) Tennessee.

the (If more than one defendant is named in the complaint, attach an additional page providing same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy the amount the plaintiff claims the defendant owes or the amount at stake is more than \$75,000, not counting interest and costs of court, because (explain):

BMI was selling music, which they had no entitlement.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

BMI Records Producer was marketing Willie Houston music without Mr. Houston's consent or knowledge

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. *\$200,000.00*

BMI Produced Houston's music - began selling his music for profit. Houston has not received any money pertaining to his music Houston wants restitution that is rightfully his.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a

another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Willotte Gloria / Willie T. Hunter, is a citizen of the State of (name) Oklahoma.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

the (If more than one plaintiff is named in the complaint, attach an additional page providing same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Lat Possum - Matthew John, is a citizen of the State of (name) Mississippi. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Lat Possum, is incorporated under the laws of the State of (name) Mississippi, and has its principal place of business in the State of (name) Mississippi. Or is incorporated under the laws of (foreign nation) _____.

and has its principal place of business in (name) Mississippi.

the (If more than one defendant is named in the complaint, attach an additional page providing same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy the amount the plaintiff claims the defendant owes or the amount at stake is more than \$75,000, not counting interest and costs of court, because (explain):

Int Porcum - took Houston's lyrics + provided them to T Model Ford (James Louis Carter).

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Int Porcum - Copyrighted infringed Houston's song, "Sallie Mae", in 2002.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Shellee Glover is seeking restitution for Copyright Infringement violation.
\$200,000.00

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a

another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

✓ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Willetta Glover/Willie T Houston, is a citizen of the State of (name) Oklahoma.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

the (If more than one plaintiff is named in the complaint, attach an additional page providing same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Oliver Natural Land Record, is a citizen of the State of (name) California. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) N/A, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) California. Or is incorporated under the laws of (foreign nation) _____.

and has its principal place of business in (name) California.

the (If more than one defendant is named in the complaint, attach an additional page providing same information for each additional defendant.)

3. The Amount in Controversy

amount at The amount in controversythe amount the plaintiff claims the defendant owes or the stakeis more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Oliver Natural sounds produced, promoted and received money without Houston knowledge

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

\$150,000.00

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a

another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

that List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Willette Glover Willis is a citizen of the State of (name) Oklahoma.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Jim Cook Apple iTunes, is a citizen of the State of (name) California. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) Jim Cook Apple iTunes, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) California. Or is incorporated under the laws of (foreign nation) _____.

and has its principal place of business in (name) California.

the (If more than one defendant is named in the complaint, attach an additional page providing same information for each additional defendant.)

3. The Amount in Controversy

amount at The amount in controversy the amount the plaintiff claims the defendant owes or the stake is more than \$75,000, not counting interest and costs of court, because (explain):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Apple itunes was advised that video's was uploaded with permission & knowledge

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

\$150,000.00

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V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11:8:2018

Signature of Plaintiff

Printed Name of Plaintiff

Willette Glover
Willette Glover/Willie T Houston

PO Box 2613

(405) 514-3688

B. For Attorneys

Sapulpa OK 74066

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address